

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF ALASKA

SAMSON TUG AND BARGE CO., INC.,
an Alaska Corporation

Plaintiff/Appellant

VS.

UNITED STATES OF AMERICA,

Defendant/Appellee.

Case Number: A03-006 CV
Admiralty JWS

**PLAINTIFF’S MOTION TO EXTEND TIME FOR FILING REPLY
TO DEFENDANT’S OPPOSITION TO PLAINTIFF’S MOTION IN LIMINE**

Plaintiff, by counsel, hereby moves this Honorable Court for an Order extending the time for filing a reply memorandum to the Government's opposition to Plaintiff's previously filed motion in limine from Friday April 25, 2008 until Wednesday April 30, 2008. As grounds for this motion, Plaintiff states as follows:

1. Due to the present crush of work Plaintiff needs a few extra days to complete the reply memorandum.
2. No party will be prejudiced by this request, nor will the progress of the case be delayed.
3. Plaintiff's counsel sought to reach counsel for the Government to try to obtain consent to the relief requested herein, but was unable to make contact.

WHEREFOR, Plaintiff requests the extension of time described herein.

Respectfully submitted,

Dated: April 25, 2008

/s/ Richard D. Gluck
Richard D. Gluck
Harold G. Bailey, Jr.
Garvey Schubert Barer
1000 Potomac Street, NW, 5th Floor
Washington, DC 20007
Counsel for Samson Tug and Barge Co., Inc.

CERTIFICATE OF SERVICE

I hereby certify that on April 25, 2008, a copy of Plaintiff's Motion to Extend Time for Filing Reply to Defendant's Opposition to Plaintiff's Motion In Limine was served electronically and by first class mail, postage prepaid to the following:

Jeanne M. Franken, Esq.
Trial Attorney
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U.S. Department of Justice
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P.O. Box 36028
San Francisco, CA 94102-3463

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/s/ Richard D. Gluck
Richard D. Gluck